

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DERRICK WASHINGTON,

*Plaintiff,*

v.

MASSACHUSETTS DEPARTMENT OF  
CORRECTION et al.

*Defendants.*

Case No. 1:23-cv-10063-MRG

**PLAINTIFF’S MOTION FOR LEAVE TO FILE REPLY TO WELLPATH, LLC’S  
OPPOSITION TO PLAINTIFF’S MOTION TO AMEND THE COMPLAINT**

Now comes Plaintiff Derrick Washington (“Plaintiff”) and respectfully asks that the Court permit him to file a brief Reply Brief no later than Wednesday, December 13, 2023 to Wellpath, LLC’s Opposition to Plaintiff’s Motion to Amend the Complaint. This motion is unopposed by counsel for Wellpath, LLC. In support of this request, Plaintiff states that Wellpath, LLC’s Opposition, ECF No. 69, makes a number of new claims and arguments Plaintiff should be allowed to respond to in this brief.

WHEREFORE, the Plaintiff respectfully asks that this Honorable Court allow him to file a short Reply Brief no later than Wednesday, December 14, 2023, and for such other and further relief as this Honorable Court may deem just and proper.

Dated: November 30, 2023

Respectfully submitted,

/s/ Sabina Mariella

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**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1, counsel for Wellpath, LLC and I conferred by e-mail on November 29-30, 2023 in good faith to attempt to resolve or narrow the issues involved in this motion. Counsel for Wellpath, LLC stated that they would not oppose this motion.

/s/ Sabina Mariella

SABINA MARIELLA

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 30, 2023, this document filed through the Court's CM/ECF system will be sent electronically to all counsel of record via the CM/ECF system and that on the day of the filing a copy will be emailed to counsel for Wellpath, LLC (Jeffrey S. Hangen, Lori K. Vaulding, Morrison Mahoney LLP, 250 Summer Street, Boston, MA 02210-1181, jhangen@morrisonmahoney.com, lvaulding@morrisonmahoney.com).

/s/ Sabina Mariella

SABINA MARIELLA